



Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-5544

EPA Region 5 Records Ctr.



315348

CERTIFIED MAIL

February 15, 1985

ENFORCEMENT NOTICE LETTER

Mr. Bruce T. Cunningham, Vice President  
Revere Copper and Brass, Inc.  
Post Office Box 250  
Clinton, Illinois 61727

Mr. Anthony B. Taubert  
Revere Copper and Brass, Inc.  
Post Office Box 250  
Clinton, Illinois 61727

Dear Messrs. Taubert and Cunningham:

Re: Revere Copper and Brass Co., Clinton, DeWitt County, Illinois

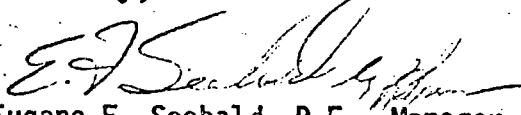
The Agency has previously informed Mr. Taubert of apparent noncompliance with the requirements of your NPDES permit, the rules of the Pollution Control Board, and the Environmental Protection Act. These charges against Revere Copper and Brass Co. (Revere) are set forth in Attachment A to this letter.

Please be advised that this matter has been referred to the Agency's legal staff for the preparation of a formal enforcement case. The Agency intends to refer this matter to the Attorney General's office for the filing of a formal complaint.

In accordance with Section 31(d) of the Environmental Protection Act, the Agency will provide you with an opportunity to meet with appropriate Agency personnel in an effort to achieve compliance with the matters set forth in Attachment A and to resolve such conflicts which could otherwise lead to the filing of a formal complaint. This meeting, if it is to be held, is required to be held within 30 days of your receipt of this notice unless the Agency agrees to a postponement.

Please contact John Pavlou of the Agency's legal staff at 217/782-5544 within seven (7) days if you wish to schedule such a meeting or at any time if you have any questions regarding this matter.

Sincerely,

  
Eugene F. Seebald, P.E., Manager  
Division of Water Pollution Control

EFS:JP:jab/335E/28

cc: FOS/DWPC IV  
CAS - Roger Cruse  
Steve Ewart, Enforcement Programs  
RU

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EN.  
STATE OF ILLINOIS



ATTACHMENT A

The Illinois Environmental Protection Agency (hereinafter Agency) believes that the Revere Copper and Brass Co. (hereinafter Revere) violated the rules of the Pollution Control Board and its NPDES Permit, by causing, or allowing, the following discharges into an unnamed tributary of Coon Creek in DeWitt County, Illinois.

- (1) In the month of November, 1983, the effluent discharged by Revere apparently contained:

- 176 mg/l of Total Suspended Solids (TSS)
- 8.3 mg/l of copper (hereinafter Cu)
- 3.32 mg/l of zinc (hereinafter Zn)
- .41 mg/l of chromium (total hexavalent) (hereinafter Cr +6)
- 3.56 mg/l of chromium (total trivalent) (hereinafter Cr +3)

which exceed the limits provided in its NPDES Permit and allowed under 35 Ill. Adm. Code 304.124.

- (2) In the month of December, 1983, the effluent discharged by Revere apparently contained:

- 77.0 mg/l TSS
- 31.25 mg/l of Cu
- \* 7.2 mg/l Cr +6 (chromium total hexavalent)
- \* 13.7 mg/l Cr +3
- 4.82 mg/l Zn
- 58.75 mg/l Iron (hereinafter Fe)

which exceed the limits in its NPDES Permit and allowed under 35 Ill. Adm. Code 304.124.

- (3) In the month of January, 1984, the effluent discharged by Revere apparently contained:

- 64.0 mg/l TSS
- 59.0 mg/l Cu
- \* 4.0 mg/l Cr +6
- \* 19.48 mg/l Cr +3
- 7.5 mg/l Zn
- 5.6 mg/l Fe

which exceed the limits provided in its NPDES Permit and allowed under 35 Ill. Adm. Code 304.124.

- (4) In the month of February, 1984, the effluent discharged by Revere apparently contained:

- 91.5 mg/l TSS
- 206.3 mg/l Cu
- 43.8 mg/l Zn



56.3 mg/l Fe  
\* 22.8 mg/l Cr +3

which exceed the limits provided in its NPDES Permit and allowed under 35 Ill. Adm. Code 304.124.

- (5) In the month of March, 1984, the effluent discharged by Revere apparently contained:

42.0 mg/l TSS  
6.25 mg/l Cu  
\* 3.52 mg/l Cr +3  
1.40 mg/l Zn  
3.59 mg/l Fe

which exceed the limits provided in its NPDES Permit and allowed under 35 Ill. Adm. Code 304.124.

- (6) In the month of April, 1984, the effluent discharged by Revere apparently contained:

9.5 mg/l Cu  
\* 5.18 mg/l Cr +3  
1.62 mg/l Zn  
2.63 mg/l Fe

which exceed the limits provided in its NPDES Permit and allowed under 35 Ill. Adm. Code 304.124.

- (7) In the month of May, 1984, the effluent discharged by Revere apparently contained:

2.5 mg/l Cu  
1.36 mg/l Zn

which exceed the limits provided in its NPDES Permit and allowed under 35 Ill. Adm. Code 304.124.

- (8) In the month of August, 1984, the effluent discharged by Revere apparently contained:

26.3 mg/l Cu  
\* 8.74 mg/l Cr +3  
4.87 mg/l Zn  
15.0 mg/l Fe  
11.5 S.U. pH

which exceed the limits provided in its NPDES Permit and allowed under 35 Ill. Adm. Code 304.124.



- (9) In the month of September, 1984, the effluent discharged by Revere apparently contained:

5.75 mg/l Cu  
3.46 mg/l Cr +3  
2.54 mg/l Zn

which exceed the limits provided in its NPDES Permit and allowed under 35 Ill. Adm. Code 304.124.

- (10) In the month of October, 1984, the effluent discharged by Revere apparently contained:

1.78 mg/l Cu  
5.15 mg/l Cu  
2.41 mg/l Cr +3  
1.49 mg/l Zn

which exceed the limits provided in its NPDES Permit and allowed under 35 Ill. Adm. Code 304.124.

- (11) Additionally, the Agency believes Revere violated the terms of their National Pollutant Discharge Elimination System (NPDES) Permit number IL0002356 by causing or allowing the ten events enumerated above, each and every event being a separate apparent violation of 35 Ill. Adm. Code 304.141.

- (12) Further, Revere is in apparent violation of NPDES permit number IL0002356 by allegedly failing to obtain authorization to construct a sludge concentrator as required by NPDES Permit Condition number 25, and 35 Ill. Adm. Code 309.154.

- (13) On or about January 11, 1984, Revere apparently caused or allowed grab samples of effluent from outfall number 002 to contain 5.8 mg/l of copper (Cu) and outfall number 003 to contain 160 mg/l concentration of copper (Cu) as well as 410 mg/l TSS, 78 mg/l Fe, and 8.5 mg/l nickel which amounts violate 35 Ill. Adm. Code 304.124, and 35 Ill. Adm. Code 304.141, and NPDES Permit IL0002356.

- (14) On or about February 23, 1984, Revere apparently caused or allowed discharge to cause or contribute to the presence of blue green colored deposits in an unnamed tributary to Cook Creek, in violation of 35 Ill. Adm. Code 302.203.

- (15) On or about February 23, 1984 Revere caused, allowed or contributed to the copper content in the unnamed tributary to Cook Creek to exceed the Water Quality Standards established by the Pollution Control Board in 35 Ill. Adm. Code 302.203 and 304.105, and apparently violated said rules.



- (16) On or about August 29, 1984, Revere apparently caused or allowed the discharge of 50 mg/l Cr, 160 mg/l Fe, and 33 mg/l Zn, in apparent violation of 35 Ill. Adm. Code 304.105 and 302.208 and further caused or allowed the discharge of 738 mg/l TSS in apparent violation of 35 Ill. Adm. Code 304.124, 304.141, and NPDES Permit IL0002356.
- (17) On or about August 29, 1984 Revere apparently caused or allowed the discharge to contain an obvious color in apparent violation of 35 Ill. Adm. Code 304.106.
- (18) On or about September 5, 1984, Revere apparently caused, allowed, or contributed to the copper content in an unnamed tributary to exceed water quality standards established by 35 Ill. Adm. Code 302.208 and 304.105 and apparently violated said rules.
- (19) On, or about, January 2, 1985 Revere caused or allowed the pH to exceed 9.0 S.U. in violation of its NPDES Permit and 35 Ill. Adm. Code 302.204 and 304.125.

JP:jk/sp/0013e,1-5



Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-0610

Revere Copper and Brass, Inc.  
Revere Copper and Brass, Inc.  
NPDES Permit No. IL0002356  
Final Permit

JAN 10 1985

Revere Copper and Brass, Inc.  
Post Office Box 250  
Clinton, Illinois 61727

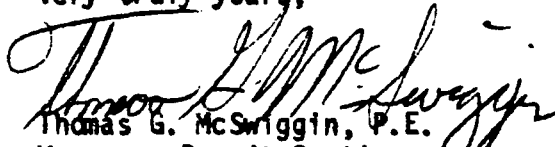
Gentlemen:

Attached is the final NPDES Permit for your discharge. The Permit as issued covers discharge limitations, monitoring, and reporting requirements. The failure of you to meet any portion of the Permit could result in civil and/or criminal penalties. The Illinois Environmental Protection Agency is ready and willing to assist you in interpreting any of the conditions of the Permit as they relate specifically to your discharge.

The Permit as issued is effective as of the date indicated on the first page of the Permit. You have the right to appeal any condition of the Permit to the Illinois Pollution Control Board prior to the effective date.

Should you have questions concerning the Permit, please contact Mark A. Schollenberger at the telephone number indicated above.

Very truly yours,

  
Thomas G. McSwiggin, P.E.  
Manager, Permit Section  
Division of Water Pollution Control

TGM:TRK:MAS:sd/196Gd/13

Enclosure: Final Permit

cc: USEPA/With Enclosure  
Region IV/With Enclosure  
Permit Section  
Records Unit  
Consulting Engineer